

JERRY S. BUSBY  
Nevada Bar #001107  
GREGORY A. KRAEMER  
Nevada Bar #010911  
COOPER LEVENSON, P.A.  
3016 West Charleston Boulevard - #195  
Las Vegas, Nevada 89102  
(702) 366-1125  
FAX: (702) 366-1857  
[jbusby@cooperlevenson.com](mailto:jbusby@cooperlevenson.com)  
[gkraemer@cooperlevenson.com](mailto:gkraemer@cooperlevenson.com)

Attorneys for Defendant  
SMITH'S FOOD & DRUG CENTERS, INC.

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ANNA MARIE FRETELUCO,  
  
Plaintiff,

vs.

SMITH'S FOOD AND DRUG CENTERS,  
INC., a foreign corporation; DOES 1-10; ROE  
CORPORATIONS 10-10; inclusive  
  
Defendants.

Case No. 2:19-cv-00759-JCM-EJY

**STIPULATION TO EXTEND DATE TO  
FILE A RESPONSE**  
**(FIRST REQUEST)**

WHEREAS, Defendant's response to Plaintiff's Motion to Strike / Exclude Defendant's Rebuttal Expert Mark L Winkler, MD. [ECF No. 48] is currently due on Monday, October 5, 2020; however, Defense counsel will be leaving Las Vegas for a personal family matter and unavailable October 1<sup>st</sup> through October 6<sup>th</sup> and unable to file the response by its current due date; and

WHEREAS, counsel for the parties have agreed to extend the date for Defense counsel to file the response for one week – until October 13, 2020;

IT IS HEREBY STIPULATED AND AGREED by and between KEITH E. GALLIHER, JR., ESQ., of THE GALLIHER LAW FIRM, Attorneys for Plaintiff ANNA MARIE FRETELUCO, and JERRY S. BUSBY, ESQ., of the law firm COOPER LEVENSON, P.A., Attorneys for Defendant SMITH'S FOOD & DRUG CENTERS, INC., that the deadline for Defendant to file a response to

///

1 Plaintiff's Motion to Strike / Exclude Defendant's Rebuttal Expert Mark L Winkler, MD. (ECF No. 48)  
2 be extended for one week, until October 13, 2020.

3 THE GALLIHER LAW FIRM

COOPER LEVENSON, P.A.

4 /s/ Keith E. Galliher, Jr.

/s/ Jerry S. Busby

5 KEITH E. GALLIHER, JR., ESQ.

JERRY S. BUSBY, ESQ.

Nevada Bar No. 00220

Nevada Bar No. 001107

6 1850 East Sahara Avenue - #107

3016 West Charleston Boulevard - #195

Las Vegas, NV 89104

Las Vegas, Nevada 89102

7 (702) 735-0049

(702) 366-1125

Attorney for Plaintiff

Attorneys for Defendant

8 ANNA MARIE FRETILUCO

SMITH'S FOOD & DRUG CENTERS, INC.

9  
10  
11 **ORDER**

12 IT IS SO ORDERED:

13   
14 UNITED STATES MAGISTRATE JUDGE

15 Dated: September 30, 2020  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28